

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,  Debtors.	PROMESA Title III  No. 17 BK 3283-LTS   (Jointly Administered)
In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO  Debtor.	PROMESA Title III  No. 17 BK 3283-LTS

**MOTION TO COMPEL COMPLIANCE WITH PROPOSED STIPULATION**

COMES NOW creditor José Miguel Malvet Santiago, through the undersigned legal counsel, and respectfully sets forth and prays:

1. In accordance with the applicable case management procedures, Movant sent a lift of stay notice on 25 July 2018 to counsel for Oversight Board and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) to advise them of Movant’s intent to seek relief from the Title III Stay at least fifteen (15) business days prior to filing a motion seeking such relief (the “Lift Stay Notice Period”) and (b) meet and confer with the Commonwealth during the Lift Stay Notice Period.

2. Movant sought the lift of stay of his case pending before the Commission for Appeals of Public Service, Case No. 2007-07-0025.

3. Afterwards, the Commonwealth and Movant met and conferred and reached an agreement stipulated in the document attached herein. Movant returned a signed and initialized copy of the document to Debtor, with the understanding that Debtor would sign its own proposed stipulation and have its counsel file it with the Commission.

4. As per the terms of the Agreement, the Stipulation would be effective and enforceable immediately upon execution.

5. As of the date of this motion, the Commonwealth has failed to act upon the terms of its own proposed agreement and Movant's case before the administrative forum continues to be stayed.

**WHEREFORE**, Movant respectfully requests from the Honorable Court to notice the foregoing and enter an order allowing the lift of stay on Case No. 2007-07-0025 before the Commission for Appeals of Public Service.

#### **CERTIFICATE OF SERVICE**

I hereby certify that, on 28 October 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and parties in the Master Service List.

The foregoing is also being e-mailed separately to all parties in interest and/or their respective counsel.

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